IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

FILED UNDER SEAL

v.

Case No. 1:23-MJ-75

KENSHAUN THOMPSON

Defendant.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Carl Swanson, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a Postal Inspector for the United States Postal Inspection Service ("USPIS"), assigned to the Washington Division and currently stationed in Merrifield, Virginia. I have held this position since April 2021. My regular responsibilities as a Postal Inspector include conducting investigations involving postal crimes and related violations of the federal code, such as mail theft, mail fraud, wire fraud, aggravated identity theft, and access device fraud. Prior to my role with the Postal Inspection Service, from January 2009 through April of 2021, I was a Special Agent with the United States Secret Service and the Criminal Investigation Division of the Environmental Protection Agency. In those roles, I investigated multiple types of violations of federal law, including wire fraud, bank fraud, identify theft, access device fraud, and federal violations pertaining to the environment.
- 2. I am submitting this affidavit in support of a criminal complaint and arrest warrant charging the defendant, KENSHAUN THOMPSON ("THOMPSON") (birth year 1998) with

receipt of stolen mail in violation of 18 U.S.C. § 1708. Specifically, there is probable cause to believe that THOMPSON received mail stolen from the West Springfield Post Office, 6200 Rolling Road, Springfield, VA 22152, on several occasions in October 2023.

PROBABLE CAUSE

- 3. Based on an increase of mail theft complaints stemming from the West Springfield Post Office, investigators increased surveillance on mailboxes. Investigators determined that at least one key which would be capable of opening the blue boxes located at the Post Office had been reported as lost or stolen and not recovered in the past. I determined that particular boxes at the Post Office were the likely target of mail thieves, and therefore established remote surveillance of them using video cameras and a license plate reader. I also installed a specialized camera that would only activate to take a still shot if the Arrow Key¹ slot was used to open the box.
- 4. On Monday, August 21, 2023, at approximately 4:42 a.m., a suspect, later identified as Adam BEKELE ("BEKELE"), appeared in a photograph from just such a camera installed on the inside of a mailbox located in West Springfield in the Eastern District of Virginia, 6200 Rolling Road, Springfield, VA 22152. To activate the surveillance, BEKELE would have had to open the blue box using a USPS Arrow key or counterfeit key:



¹ "Arrow Keys" are specialized general access keys capable of opening many different postal boxes. They are often stolen or fraudulently obtained by those who want to steal mail. When used lawfully, arrow keys are essential to conducting USPS business. They are serialized and logged daily within the appropriate delivery unit or post office. USPS carriers and clerks are required to sign out and sign in USPS Arrow keys whenever they are used. At no time is any USPS employee or other person to have possession of a USPS Arrow key other than during working hours, on official USPS business, and only after completing the USPS Arrow key log with USPS management.

5. I later obtained footage from Sunday, October 1, 2023, at approximately 5:45 a.m. which appeared to depict the same person. In this instance I had obtained surveillance footage from the same West Springfield Post Office USPS jumbo box using a color video camera and license plate reader. The surveillance showed a 2012 Ford four door sedan bearing VA License plate TUE-XXXX.² In the video footage, the suspect used a key to enter the blue box, reached in and removed numerous mail pieces, then placed them in the back seat of the sedan before closing the blue box and departing.³



6. On Monday, October 2, 2023, using the plate number, I identified the Ford sedan as a rental car belonging to Rental Car Company-1. I was able to determine that the Ford sedan, TUE-XXXX, was rented by BEKELE. According to the Rental Car Company-1 representative, BEKELE provided his Virginia Driver's License to rent the car. According to the

² The exact license plate numbers have been redacted throughout this affidavit with the use of XX to represent numbers.

³ On October 2, 2023, I examined the blue box in question and noted that there was no damage or evidence of the lock or cabinet being opened by force.

representations of the Rental Car Company-1 agent and my review of the rental agreement on file, BEKELE began the rental on September 19, 2023, and was still in possession of the car.

- 7. On October 4, 2023, a representative from Rental Car Company-1 called and advised that BEKELE had returned the Ford sedan, Virginia Plate TUE-XXXX, and ended his rental agreement. The following day, I responded to Rental Car Company-1's office. I confirmed the Ford sedan rented by BEKELE had the same Virginia License plate seen in the surveillance photo taken at the same time of the mail theft. Further, I noticed a missing or damaged gas cap cover, which I believe to be consistent with the vehicle BEKELE is seen exiting and into which he placed stolen mail on October 1, 2023, as seen on the surveillance from the October 1, 2023, mail theft.
- 8. The Rental Car Company-1 representative also provided a printout containing the latitude and longitude location history of the rental car. That data showed that the rental car was parked consistently in the vicinity of 56XX Eastbourne Drive, Springfield, VA 22151.⁴
- 9. A check of the persons associated with the residence at 56XX Eastbourne Drive, Springfield, VA 22151 revealed an individual named KENSHAUN THOMPSON as someone that has a Virginia driver's license registered to the address. As a part of my investigation, I reviewed THOMPSON's driver's license photograph.
- 10. I later reviewed surveillance footage from October 20, 2023, at approximately 2:35 a.m., which I also believe showed BEKELE unlawfully using an Arrow Key and stealing mail. In that footage, a black Ford Taurus sedan bearing Virginia tag TRI-XXXX (as captured by a license plate reader) pulled up to the same West Springfield blue box which BEKELE had

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⁴ The GPS associated with the rental car was not on all the time, but only activated when certain parameters set by the rental car company were met, e.g., high speed. Data for location of the car was also requested by the rental car company itself on several occasions after the renter had not paid a bill for the rental.

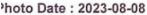
previously robbed on August 21, 2023 and October 1, 2023. Then BEKELE, wearing what appears to be similar or the same clothing that he wore during the previous mail theft, exited the sedan, and in much the same way he did in previous surveillance footage, approached the blue box and used a key to open it. On the footage he removed the two mail bins from inside and proceeded to dump them into the back seat of the Ford Taurus sedan, Virginia plate TRI-XXXX.



- 11. On October 20, 2023, at approximately 9:00 a.m. (approximately 6 ½ hours after the surveillance footage above was taken), I observed the Ford Taurus bearing the Virginia license plate TRI-XXXX, parked on the street in front of 56XX Eastbourne Drive.
- 12. During the course of my investigation, I learned that that BEKELE was the current renter of 55XX Seminary Road, Apartment 18XXX, Falls Church, 22041, which is located within the South Tower of the Skyline Towers Apartment complex.

13. I reviewed security surveillance footage from that location and made several observations of an individual that I believed to be THOMPSON interacting with BEKELE and others on the dates and at the times when BEKELE had stolen mail. I first determined that one individual I observed in the footage was THOMPSON by comparing his photograph from his driver's license to the security footage:





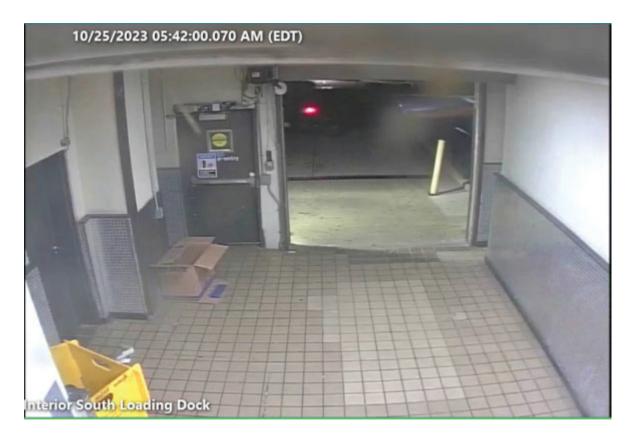


- 14. In the security camera footage, I also observed several interactions which I believe show concerted effort by BEKELE to steal mail and transfer it to THOMPSON, who then delivered it to the apartment rented in BEKELE's name.
- 15. This includes October 24, 2023, at approximately 3:50 a.m. In surveillance footage from that date taken by the camera I installed, I observed BEKELE again using a USPS key to access the blue box at the West Springfield Post Office without authorization. He is wearing a grey hooded sweatshirt and black mid length jacket while removing two tubs of mail from the blue box.
 - a. Prior to entering the box, the black Ford Taurus described above turned past the blue boxes. BEKELE emerged later from the same direction where the Ford Taurus appears to have parked just off camera.

- b. Less than two hours later, at 5:15 a.m., BEKELE arrived at the South Tower of the Skyline Towers Apartment complex in the Ford Taurus still wearing the gray hooded sweatshirt and black mid-length jacket. His sweatshirt had a gold logo on the lower front portion, consistent with the gray sweatshirt BEKELE was observed wearing during the October 1 and October 20 mail thefts.
- c. BEKELE parked at the basement entrance to the South Tower on October 24, 2023. Shortly after he stopped his car, THOMPSON entered the elevator on the 18th Floor from the right side of the frame (consistent with the location of apartment 18XXX rented in BEKELE's name). THOMPSON emerged from the elevator in the basement level of the South Tower. He then opened the door and received a black bag and what appeared to be several pieces of loose first-class mail from BEKELE. The below image shows THOMPSON holding a bag in his right hand and mail in his left, with BEKELE waiting at the building entrance:



- d. THOMPSON again entered the 18th Floor surveillance elevator at approximately 5:48 a.m. He reemerged back on the basement floor, exited the building, and proceeded to meet BEKELE and depart with him at approximately 5:55 a.m. in the same black Ford Taurus.
- 16. By reviewing other similar surveillance footage, I am aware that BEKELE, using the same Ford Taurus, and using similar *modus operandi*, accessed the blue box at the West Springfield Post Office on October 25 and October 26, 2023. These other dates show other interactions between BEKELE and THOMPSON like the one detailed at the apartment building on October 24, 2023. Like that other time, there was a theft followed shortly by delivery of mail to THOMPSON at the apartment building. Specifically, by comparing video from the mailbox to video from the Skyline Apartment I observed the following:
- 17. On October 25, 2023, at approximately 4:43 a.m., BEKELE opened the blue mailbox in West Springfield, after driving the same Ford Taurus, wearing what appears to be the same gray hooded sweatshirt and flannel over shirt.
 - a. At 5:40 a.m., THOMPSON appeared in a mid-length bubble jacket exiting the loading dock to the Skyline Towers. He reentered the building with a black gym bag through the garage door next to the exit door.
 - b. At 5:41 a.m., THOMPSON departed in what appears to be the same Black Ford Taurus, which I was able to observe through the open garage door's security camera:



18. Likewise, on October 26, 2023:

- a. At approximately 3:30 a.m., BEKELE appears on surveillance footage stealing the mail from the West Springfield Post Office. Later that same morning, at approximately 4:39 a.m., BEKELE pulls up to the South Tower driving lane of Skyline Towers in the black Ford Taurus. He steps out of the car with a cellular phone in hand but nothing else.
- b. At the same time on another camera, THOMPSON appears on surveillance footage at the Skyline Towers South building loading dock area (the opposite side of the building) using a cellular phone, looking in and out of the door. The driving lane camera then shows BEKELE getting back into the car and departing the South Tower driving lane.

c. At approximately 4:43 a.m., four minutes after seeming to communicate using the

phone at 4:39 a.m., THOMPSON is seen opening the door and receiving a large

black bag, though the camera angle does not specifically show BEKELE.

d. Based what I observed in multiple camera angles, it appears that BEKELE arrived

at the wrong location for a transfer, and then moved to the location where

THOMPSON was waiting.

19. In summary, based on my investigation, I believe that THOMPSON received stolen

mail directly from BEKELE on at least October 24, October 25, and October 26, 2023.

CONCLUSION

20. I respectfully submit that the foregoing facts established in this affidavit

demonstrate probable cause that KENSHAUN THOMPSON received stolen mail in violation of

18 U.S.C. § 1708. Accordingly, I respectfully request that the Court issue the proposed criminal

complaint and arrest warrant.

Respectfully submitted,

arl Swanson

Carl Swanson

Postal Inspector

United States Postal Inspection Service

Attested to by the applicant in accordance With the requirements of Fed. R. Crim. P. 41 via telephone on February 29, 2024.

9-00

Digitally signed by Ivan Davis Date: 2024.02.29 13:53:37 -05'00'

Honorable Ivan D. Davis

United States Magistrate Judge

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